

EXHIBIT B

Shotzbarger, William

From: Justina K. Sessions <JSessions@kvn.com>
Sent: Friday, November 18, 2016 2:27 PM
To: Shotzbarger, William
Cc: Parks, J. Manly; Sperl, Andrew R.
Subject: RE: In re Auto Parts MDL - Subpoena to Honda

William,

In collecting and producing materials responsive to the subpoena, Honda used the definition of "Vehicle" provided in the subpoena, which is "an automobile or other motor Vehicle that is principally used for transporting from one to eight passengers and is designed to operate primarily on roads" As I have previously told you, ATVs and side-by-sides do not fall within the serving parties' definition of vehicle and, therefore, are outside the scope of the subpoena. Moreover, even if ATVs and side-by-sides did fall within the scope of the subpoena, Honda would object to the request as overbroad and unduly burdensome, as the additional effort to collect and produce data for ATVs and side-by-sides— which would be separate from and in addition to the already monumental burden posed by the requests with respect to "Vehicles" — is unjustified, particularly in light of the small number of ATVs and side-by-sides at issue in the case and Honda's even smaller share of that production.

Regards,
Justina

From: Shotzbarger, William [mailto:WShotzbarger@duanemorris.com]
Sent: Friday, November 18, 2016 6:37 AM
To: Justina K. Sessions
Cc: Parks, J. Manly; Sperl, Andrew R.
Subject: RE: In re Auto Parts MDL - Subpoena to Honda

Justina,

Thank you for this production from Honda. I note that the production contains "Quarterly cost quotations for all vehicles sold by American Honda Motor Company, Inc. since 1998. These cost quotations reflect the price at which the manufacturing plant sells all vehicles to American Honda Motor Company, Inc. (the sole distributor of Honda vehicles in North America)."

Is information for Honda's ATVs and side-by-sides included there, or anywhere else, in the production?

Regards,
Bill

William Shotzbarger
Associate

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From: Justina K. Sessions [<mailto:JSessions@kvn.com>]

Sent: Wednesday, November 16, 2016 10:30 PM

To: ronnie@hbsslw.com; Evelyn Li (evelyn@cuneolaw.com); Trager, Lara (Lara.Trager@weil.com); Shotzbarger, William; Carome, Patrick (Patrick.Carome@wilmerhale.com); Smith, Brian C. (Brian.Smith@wilmerhale.com); drowe@dbcllp.com; Garth Wojtanowicz; Worthington, Matthew; Steve Williams

Subject: In re Auto Parts MDL - Subpoena to Honda

Counsel,

Please see attached correspondence and production link below. The password will follow in a separate email.

Regards,

Justina

Please click on the following link to download the attachments:

<https://sendfiles.kvn.com/message/3S5yET9CBM6BOyv35I0Fo>

Justina K. Sessions

Attorney at Law

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